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October 19, 2021

Via ECF

Hon. Laura Taylor Swain
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States v. Constantinescu, et al., 19-cr-651 (LTS)

Your Honor:

I am counsel to Iuliana Mihailescu, a defendant in the above reference case. I write to request a one-time bail modification to permit Ms. Mihailescu to travel to Florida in December 2021. Her Pretrial Services Officer, Dominique Jackson, has no objection to this request and the government has informed defense counsel that it defers to Pretrial Services.

Several years ago, Ms. Mihailescu and her husband signed up for a vacation club, also known as a timeshare. They had a trip planned for late 2019, but due to the instant case, they did not travel. If they do not travel and use the timeshare this calendar year, they will have to pay a significant financial penalty. Ms. Mihailescu has two young children, and this trip would be for their benefit.

Her arrival date in Florida would be December 23, 2021 and her departure date would be December 30, 2021. To save money, the family would likely travel by car, and stop one-night each on the way there and the way back. If this request is approved, Ms. Mihailescu will provide her full itinerary, including where the family intends to stop on the way there and on the way back, to her Pretrial Services Officer, as well as check-in as requested by Officer Jackson.

Accordingly, we respectfully request that the Court modify Ms. Mihailescu's current bail conditions to permit her to travel from December 22, 2021 through December 31, 2021 to Florida, making two overnight stops during the travel time-period.



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I thank the Court for its attention to this matter.

Respectfully submitted,

/s/

Dawn M. Cardi

cc: All Parties (via ECF)
Pre-Trial Services Officer Dominique Jackson (via e-mail)

The requested modification is granted. DE# 899 resolved.
SO ORDERED.

10/20/2021

/s/ Laura Taylor Swain, Chief USDJ